

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

FEE APPLICATION COVER SHEET
FOR THE PERIOD FEBRUARY 1 TO FEBRUARY 28, 2022

Debtor: LTL Management LLC

Applicant: **Blake, Cassels & Graydon LLP**

Case No.: 21-30589-MBK

Client: LTL Management LLC (“LTL”)

Chapter: 11

Case Filed: October 14, 2021 (the “Petition Date”)

SECTION 1
FEE SUMMARY

☐ Interim Fee Application No. _____ or ☐ Final Fee Application

Summary of Amounts Requested for the Period from February 1 to February 28, 2022 (the “Fourth Statement Period”).

	USD
Total Fees:	\$71,327.68
Total Disbursements:	\$256.00
Total Taxes:	\$9,272.60
Total Fees, Disbursements and Taxes:	\$80,856.28
Minus 20% Holdback of Fees:	(\$14,265.54)
Amount Sought at this Time:	\$66,590.74

	<u>FEES</u>	<u>EXPENSES and TAXES</u>
Total Previous Fees Requested:	\$254,286.59	\$33,748.83
Total Fees Allowed to Date:	\$0.00	\$0.00
Total Retainer (If Applicable):	N/A	N/A
Total Holdback (If Applicable):	\$50,857.32	N/A
Total Received by Applicant:	\$0.00	\$0.00

Name of Professional & Title	Year Admitted	Hours	Rate (CAD)	Fees (CAD)
Gordon McKee Partner, Litigation & Dispute Resolution (Toronto)	1988	2.4	\$964.00	\$2,313.60
Linc Rogers Partner, Restructuring & Insolvency (Toronto)	2000	34.0	\$862.00	\$29,308.00
Caitlin McIntyre Associate, Restructuring & Insolvency (Toronto)	2017	85.9	\$541.00	\$46,471.90
Jake Harris Articling Student, Restructuring & Insolvency (Toronto)	N/A	4.1	\$281.00	\$1,152.10
Nancy Thompson Law Clerk, Restructuring & Insolvency (Toronto)	N/A	27.4	\$360.00	\$9,864.00
Carlo Amoroso Filing Clerk (Toronto)	N/A	N/A	<i>Flat Rate</i>	\$50.00

**SECTION II
SUMMARY OF SERVICES**

SERVICES RENDERED	HOURS	FEES (USD)
1. Litigation Consulting: CCAA Recognition Proceedings Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	133.8	\$65,166.64
2. Fee and Retention Application Preparation of employment and fee applications for self or others; motions to establish interim procedures	20.0	\$6,161.04
3. Litigation: Canadian Actions Other than Avoidance Action Litigation		
8. Litigation: General / All Class Actions Other than Avoidance Action Litigation		
SERVICE TOTALS	153.8	\$71,327.68

Note: Fees for No. 3 are allocated 33.33% to LTL and 66.67% to J&J, which allocation is reflected in the breakdown of amounts set out on page 1

**SECTION III
SUMMARY OF DISBURSEMENTS**

Matter No.	DISBURSEMENTS SUBJECT TO HST	AMOUNT (CAD)
	DISBURSEMENTS NOT SUBJECT TO HST	AMOUNT (CAD)
1	Court Fees	\$320.00
	DISBURSEMENTS TOTALS	\$320.00

Note: Disbursements for matter No. 3 are allocated 33.33% to LTL and 66.67% to J&J, which allocation is reflected in the breakdown of amounts set out on page 1

**SECTION IV
CASE HISTORY**

1. Date of Retention: January 28, 2022, effective as of the Petition Date [Dkt. 1284] (the “Retention Order”).¹
2. Summary explaining the nature of the work performed and the results achieved:
 - Updating Information Officer on progress in the proceedings, including a summary of events in the Chapter 11 proceedings;
 - Observing hearing concerning preliminary injunction extension and dismissal motions in the Chapter 11 proceedings in order to fully inform the Canadian Court;
 - Preparing materials for and attending hearing on February 25, 2022 before the Canadian Court for a short extension of the stay of proceedings in the Canadian CCAA proceedings;
 - Preparing motion materials for recognition of the extension of the preliminary injunction in the Canadian CCAA proceedings on March 7, 2022;
 - Reviewing and establishing billing guidelines, process and procedure and attending to implementing changes to ensure in compliance with all requirements; and
 - Preparing monthly fee statements, for the periods from October 14 to December 15 2021 and from December 16 to December 31, 2021.

I certify under penalty of perjury that the above is true.

Date: March 28, 2022

/s/ Linc Rogers

Linc Rogers

Blake, Cassels & Graydon LLP

¹ The Retention Order is attached hereto as Exhibit A.